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September 30, 1982

Stephen Shakman, Esq.
Minnesota Pollution Control Agency
1935 W. County Road B2
Roseville, Minnesota 55113

Re: U.S.A. v. Reilly Tar & Chemical Corp., et al.
Civ. File No. 4-80-469

Dear Steve:

Thank you for your letter of September 15, 1982. I have now had a chance to discuss it with my client and with ERT. At yesterday's meeting we discussed the subject of expenses incurred with respect to the exploration of Well 23, and I will respond further after your statement for September is ready. You already have my letter of September 17.

We agree that explanation to the public of the elements of a comprehensive solution is required under the Superfund Act and it is also important to a successful solution of the problem. In that respect, we hope that all parties will continue to be careful in disseminating information to the news media, so that the media does not exaggerate the seriousness of the problem.

We are puzzled by the fourth paragraph of your letter. My notes indicate that I asked ERT whether they had any special expertise with respect to the question of abandonment of multi-aquifer wells. I don't believe that that was directly responded to, although there was a discussion to the effect that ERT possesses unique expertise with respect to biodecontamination as a treatment alternative for highly contaminated water. In fact, ERT does possess a great deal of expertise on the subject of groundwater modeling.

Reilly has retained ERT to prepare a written report describing a comprehensive solution to the St. Louis Park problems.

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Work on that report is commencing; however, it will not be possible to submit it by November 1. Rather, we propose to submit it to the State by December 31, 1982.

Yours very truly,



Edward J. Schwartzbauer

EJS:ml

cc: Erica L. Dolgin
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